

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

MALIBU MEDIA, LLC,	:	CIVIL ACTION NO. 4:15-CV-2281
	:	
Plaintiff and Counterclaim	:	(Chief Judge Conner)
Defendant,	:	
	:	
v.	:	
	:	
JOHN DOE subscriber assigned IP	:	
Address 71.58.216.197,	:	
	:	
Defendant, Counterclaim	:	
Plaintiff, and Third-Party	:	
Plaintiff,	:	
	:	
v.	:	
	:	
CHRISTOPHER FIORE, BRIGHAM :	:	
FIELD, and COLETTE PELISSIER- :	:	
FIELD,	:	
	:	
Third-Party Defendants	:	

**RESPONSE TO PLAINTIFF’S MOTION FOR EXTENSION OF TIME TO
FILE DISCOVERY RESPONSES**

Defendant respectfully offers the following in response to Plaintiff’s Motion to extend the time in which it has to serve discovery responses. Defendant offers in support and avers as follows:

On December 9, 2017, Defendant served discovery requests on Plaintiff Malibu Media, LLC. Plaintiff’s responses were due on January 9, 2017.

Had Plaintiff merely contacted Defendant and requested an extension, Defendant would have agreed to without the need of this Court's intervention. Defendant agrees to an extension to January 25, 2017.

Defendant would prefer to agree to Plaintiff's request and allow the extra time so that Plaintiff may provide full and complete answers to Defendant's requests, opposed to having Plaintiff offer vapid objections merely to create more time.

WHEREFORE Defendant respectfully agrees to extend the time for Plaintiff to serve full and complete discovery responses on or before January 25, 2017.

Dated: January 13, 2017

Respectfully submitted,

/s/Aaron Brooks
Aaron Brooks PA# 207801
Attorney for the Defense
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CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2017, I electronically filed the forgoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record through this system.

Dated: January 13, 2017

Respectfully submitted,

/s/Aaron Brooks
Aaron Brooks PA# 207801
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